## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

LITIGATION

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This document applies to:

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

ETHICON WAVE 11 CASES LISTED IN PLAINTIFFS' EXHIBIT A

## NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING DOUGLAS GRIER, M.D. FOR WAVE 11

Plaintiffs filed a Notice of Adoption (Dkt. 8479) as to the general causation opinion testimony of Douglas Grier, M.D in the Wave 11 cases identified in Exhibit A to their Notice. In response, Defendants Johnson & Johnson and Ethicon, Inc. hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general causation opinions of Douglas Grier, M.D. for Ethicon Wave 3 (Dkt. 2921) as their response for Wave 11. Defendants respectfully request that the Court deny Plaintiffs' motion for the reasons expressed in their Wave 3 response briefing.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I certify that on this day, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage
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